

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

STEPHEN SCHUKO

Criminal No. 04-00273-JLA

MOTION TO MODIFY TERMS OF PRETRIAL RELEASE

Defendant Stephen Schuko respectfully requests that this Court modify the terms of his pre-trial release to allow him to travel to Vermont with his children. In support, Mr. Schuko states as follows:

1. Mr. Schuko wishes to travel to Stow, Vermont with his children from March 24 through March 27, 2005 for vacation.
2. Mr. Schuko will be driving to Vermont and is prepared to forward his contact information to Pretrial Services.
3. Since he has been released on bail, Mr. Schuko has met each and every condition imposed upon him, and he will continue to do so for the duration of this case.
4. As this Court may recall, it previously found that Mr. Schuko is **not** a flight risk. Since that time, there has not been any change in circumstances that would warrant a different conclusion, and there is no reason to believe that Mr. Schuko would not return to Massachusetts to face the charges against him.

WHEREFORE, Mr. Schuko respectfully requests that this Court grant his Motion to Modify Terms of Pretrial Release to allow him to travel to Vermont on March 24 through March 27, 2005.

Respectfully submitted,
STEPHEN SCHUKO,
By his attorneys,

/s/ Richard M. Egbert
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CERTIFICATE OF SERVICE

I, Richard M. Egbert, hereby certify that on March 4, 2005, I caused a copy of the forgoing to be served via first class mail, postage prepaid, upon counsel for the Assistant United States Attorney Susan Poswistilo.

/s/ Richard M. Egbert
Richard M. Egbert